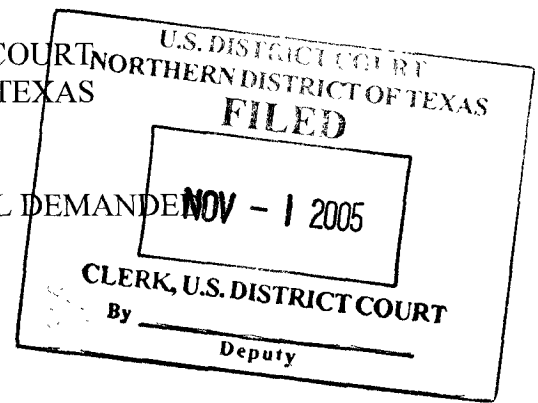


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION



TSEPHANYAH Y. HAWKINS  
YAHCHANAN Y. HAWKINS  
and COURTROOM DATA SOLUTIONS,  
INC.,

Plaintiffs,

VS.

THE HONORABLE JOHN W. WEEKS,  
in his personal capacity,  
CLAUDIA M. HUTCHISON, in her  
personal capacity and in her capacities  
with S.A.W. Solutions, Inc., StenoScribe,  
Incorporated, Vocedit, Inc., and/or The  
South Carolina School of Court Reporting, Inc.  
NORMAN M. OSTER, in his personal  
capacity and in his capacities with S.A.W.  
Solutions, Inc., StenoScribe, Incorporated,  
Vocedit, Inc., and/or The South Carolina  
School of Court Reporting, Inc.,  
STENOSCRIBE, INCORPORATED,  
VICTORA L. CARTER,  
MARILYN GARDNER, in her personal  
capacity and her capacities with The National  
Institute of Realtime Reporters, Inc.,  
JOHN A. CHISTOLINI, in his personal  
capacity and his capacities with The National  
Institute of Realtime Reporters, Inc.,  
THE NATIONAL INSTITUTE OF  
REALTIME REPORTERS, INC., S.A.W.  
SOLUTIONS, INC., THE SOUTH  
CAROLINA SCHOOL OF COURT  
REPORTING, INC., VOCEDIT, INC.,  
CHARLES C. SELF III, DONALD L.  
ANDERSON JR., WHITTEN & YOUNG, PC  
CARTER LAW OFFICES, CHISTOLINI  
AND DESIMONE, INC.,  
Defendants.

JURY TRIAL DEMAND

CASE NO. 1-05CV-184-C

**DEFENDANTS', WHITTEN & YOUNG, P.C., CHARLES C. SELF III  
and DONALD L. ANDERSON, ORIGINAL ANSWER**

Defendants Whitten & Young, P.C. ("Whitten & Young"), Charles C. Self, III ("Self"), and Donald L. Anderson ("Anderson") (collectively "Defendants") file their Original Answer to Plaintiffs' Original Complaint subject to Defendants' defenses under Fed.R.Civ.P. 12(b) as follows:

1. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 1 of Plaintiffs' Original Complaint.
2. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 2 of Plaintiffs' Original Complaint.
3. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 3 of Plaintiffs' Original Complaint.
4. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 4 of Plaintiffs' Original Complaint.
5. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 5 of Plaintiffs' Original Complaint.
6. Defendants admit that venue is proper in this District. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 6 of Plaintiffs' Original Complaint.
7. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of the first two sentences of paragraph 7 of Plaintiffs' Original Complaint. Defendants admit that Courtroom Data Solutions, Inc. was previously known as StenoScribe, and that it changed its name on November 12, 2003. Defendants deny the remainder of paragraph 7.

8. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 8 of Plaintiffs' Original Complaint. Defendants admit that Plaintiff is an individual. Defendants admit that Plaintiff was the sole incorporator of CDS.

9. Defendants admit that Plaintiff is an individual. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 9 of Plaintiffs' Original Complaint.

10. Defendants admit the allegations of the first sentences of paragraph 10. Defendants admit that Weeks was acting as a State of Texas District Judge. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 10 of Plaintiffs' Original Complaint.

11. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 11 of Plaintiffs' Original Complaint.

12. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 12 of Plaintiffs' Original Complaint.

13. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 13 of Plaintiffs' Original Complaint.

14. Defendants admit that Claudia Hutchison is an individual. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 14 of Plaintiffs' Original Complaint.

15. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 15 of Plaintiffs' Original Complaint.

16. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 16 of Plaintiffs' Original Complaint.

17. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 17 of Plaintiffs' Original Complaint.

18. Defendants admit that Victoria L. Carter is an attorney, and previously represented Hutchison. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 18 of Plaintiffs' Original Complaint.

19. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 19 of Plaintiffs' Original Complaint.

20. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 20 of Plaintiffs' Original Complaint.

21. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 21 of Plaintiffs' Original Complaint.

22. Defendants admit the allegations in paragraph 22.

23. Defendants admit the allegations of paragraph 23. Deny as to the date.

24. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 24 of Plaintiffs' Original Complaint.

25. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 25 of Plaintiffs' Original Complaint.

#### **FACTS**

26. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 26 of Plaintiffs' Original Complaint.

27. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 27 of Plaintiffs' Original Complaint.

28. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 28 of Plaintiffs' Original Complaint.

29. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 29 of Plaintiffs' Original Complaint.

30. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 30 of Plaintiffs' Original Complaint.

31. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 31 of Plaintiffs' Original Complaint.

32. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 32 of Plaintiffs' Original Complaint.

33. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 33 of Plaintiffs' Original Complaint.

34. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 34 of Plaintiffs' Original Complaint.

35. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 35 of Plaintiffs' Original Complaint.

36. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 36 of Plaintiffs' Original Complaint.

37. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 37 of Plaintiffs' Original Complaint.

38. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 38 of Plaintiffs' Original Complaint.

39. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 39 of Plaintiffs' Original Complaint.

40. Defendants admit the allegation in paragraph 40.

41. Defendants admit the allegations in paragraph 41.

42. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 42 of Plaintiffs' Original Complaint.

43. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 43 of Plaintiffs' Original Complaint.

44. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 44 of Plaintiffs' Original Complaint.

45. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 45 of Plaintiffs' Original Complaint.

46. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 46 of Plaintiffs' Original Complaint.

47. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 47 of Plaintiffs' Original Complaint.

48. Defendants admit the allegation in paragraph 48.

49. Defendants admit the allegation in paragraph 49.

50. Defendants admit the allegation in paragraph 50.

51. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 51 of Plaintiffs' Original Complaint.

52. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 52 of Plaintiffs' Original Complaint.

53. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 53 of Plaintiffs' Original Complaint.

54. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 54 of Plaintiffs' Original Complaint.

55. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 55 of Plaintiffs' Original Complaint.

56. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 56 of Plaintiffs' Original Complaint.

57. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 57 of Plaintiffs' Original Complaint.

58. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 58 of Plaintiffs' Original Complaint.

59. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 59 of Plaintiffs' Original Complaint.

60. Defendants admit the allegation in paragraph 60.

61. Defendants admit the allegation in paragraph 61.

62. Defendants admit the allegation in paragraph 62.

63. Defendants admit the allegation in paragraph 63.

64. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 64 of Plaintiffs' Original Complaint.

65. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 65 of Plaintiffs' Original Complaint.

66. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 66 of Plaintiffs' Original Complaint.

67. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 67. Otherwise, the allegations in paragraph 67 are denied.

68. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 68. Otherwise, the allegations in paragraph 68 are denied.

69. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 69 of Plaintiffs' Original Complaint.

70. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 70 of Plaintiffs' Original Complaint.

71. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 71 of Plaintiffs' Original Complaint.

72. Defendants admit the first sentence of paragraph 72. Defendants admit that no writ of mandamus was filed in the state court case. Defendants admit that Anderson acted as co-counsel for CDS and Hawkins. Otherwise, the allegations of paragraph 72 are denied.

73. Defendants admit receiving the Verified Complaint, as attorneys for Hawkins and CDS. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 73 of Plaintiffs' Original Complaint.



74. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 74 of Plaintiffs' Original Complaint.

75. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 75 of Plaintiffs' Original Complaint.

76. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 76 of Plaintiffs' Original Complaint.

77. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 77 of Plaintiffs' Original Complaint.

78. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 78 of Plaintiffs' Original Complaint.

79. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 79 of Plaintiffs' Original Complaint.

80. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 80 of Plaintiffs' Original Complaint.

81. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 81 of Plaintiffs' Original Complaint.

82. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 82 of Plaintiffs' Original Complaint.

83. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 83 of Plaintiffs' Original Complaint.

84. Defendants admit the allegation in paragraph 84.

85. Defendants admit the allegation in paragraph 85.

86. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 86 of Plaintiffs' Original Complaint.

87. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 87 of Plaintiffs' Original Complaint.

88. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 88. Otherwise, the allegations in paragraph 88 are denied.

89. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 89. Otherwise, the allegations in paragraph 89 are denied.

90. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 90. Otherwise, the allegations in paragraph 90 are denied.

91. Defendants admit that they objected to the order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 91 of Plaintiffs' Original Complaint.

92. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 92 of Plaintiffs' Original Complaint.

93. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 93. Otherwise, the allegations in paragraph 93 are denied.

94. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 94. Otherwise, the allegations in paragraph 94 are denied.

95. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 95. Otherwise, the allegations in paragraph 95 are denied.

96. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 96 of Plaintiffs' Original Complaint.

97. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 97 of Plaintiffs' Original Complaint.

98. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 98 of Plaintiffs' Original Complaint.

99. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 99 of Plaintiffs' Original Complaint.

100. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 100 of Plaintiffs' Original Complaint.

101. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 101 of Plaintiffs' Original Complaint.

102. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 102 of Plaintiffs' Original Complaint.

103. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 103 of Plaintiffs' Original Complaint.

104. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 104 of Plaintiffs' Original Complaint.

105. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 105 of Plaintiffs' Original Complaint.

106. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 106 of Plaintiffs' Original Complaint.

107. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 107 of Plaintiffs' Original Complaint.

108. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 108 of Plaintiffs' Original Complaint.

109. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 109 of Plaintiffs' Original Complaint.

110. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 110 of Plaintiffs' Original Complaint.

111. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 111 of Plaintiffs' Original Complaint.

112. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 112 of Plaintiffs' Original Complaint.

113. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 113 of Plaintiffs' Original Complaint.

114. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 114 of Plaintiffs' Original Complaint.

115. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 115 of Plaintiffs' Original Complaint.

116. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 116 of Plaintiffs' Original Complaint.

117. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 117 of Plaintiffs' Original Complaint.

118. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 118 of Plaintiffs' Original Complaint.

119. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 119 of Plaintiffs' Original Complaint.

120. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 120 of Plaintiffs' Original Complaint.

121. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 121 of Plaintiffs' Original Complaint.

122. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 122 of Plaintiffs' Original Complaint.

123. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 123 of Plaintiffs' Original Complaint.

124. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 124 of Plaintiffs' Original Complaint.

125. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 125 of Plaintiffs' Original Complaint.

126. Defendants admit that they contacted Ann Plainos regarding use of the name. Defendants admit that no written authorization for use of the name was received. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 126 of Plaintiffs' Original Complaint.

127. Defendants deny the allegations in paragraph 127.

128. Defendants deny the allegations in paragraph 128.

129. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 129 of Plaintiffs' Original Complaint.

130. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 130 of Plaintiffs' Original Complaint.

131. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 131 of Plaintiffs' Original Complaint.

132. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 132 of Plaintiffs' Original Complaint.

133. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 133 of Plaintiffs' Original Complaint.

134. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 134 of Plaintiffs' Original Complaint.

135. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 135 of Plaintiffs' Original Complaint.

136. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 136 of Plaintiffs' Original Complaint.

137. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 137 of Plaintiffs' Original Complaint.

138. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 138 of Plaintiffs' Original Complaint.

139. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 139 of Plaintiffs' Original Complaint.

140. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 140 of Plaintiffs' Original Complaint.

141. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 141 of Plaintiffs' Original Complaint.

142. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 142 of Plaintiffs' Original Complaint.

143. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 143 of Plaintiffs' Original Complaint.

144. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 144 of Plaintiffs' Original Complaint.

145. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 145 of Plaintiffs' Original Complaint.

146. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 146 of Plaintiffs' Original Complaint.

147. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 147 of Plaintiffs' Original Complaint.

148. Defendants admit that an appeal was made to the Eleventh Court of Appeals. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 148 of Plaintiffs' Original Complaint.

149. Defendants admit the allegations in paragraph 149.

150. Defendants deny the allegations in paragraph 150.

151. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 151 of Plaintiffs' Original Complaint.

152. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 152 of Plaintiffs' Original Complaint.

153. Paragraph 153 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 153.

154. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 154 of Plaintiffs' Original Complaint.

155. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 155 of Plaintiffs' Original Complaint.

156. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 156 of Plaintiffs' Original Complaint.

157. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 157 of Plaintiffs' Original Complaint.

158. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 158 of Plaintiffs' Original Complaint.



159. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 159 of Plaintiffs' Original Complaint.

160. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 160 of Plaintiffs' Original Complaint.

161. Paragraph 161 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 161.

162. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 162 of Plaintiffs' Original Complaint.

163. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 163 of Plaintiffs' Original Complaint.

164. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 164 of Plaintiffs' Original Complaint.

165. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 165 of Plaintiffs' Original Complaint.

166. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 166 of Plaintiffs' Original Complaint.

167. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 167 of Plaintiffs' Original Complaint.

168. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 168 of Plaintiffs' Original Complaint.

169. Paragraph 169 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 169.

170. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 170 of Plaintiffs' Original Complaint.

171. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 171 of Plaintiffs' Original Complaint.

172. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 172 of Plaintiffs' Original Complaint.

173. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 173 of Plaintiffs' Original Complaint.

174. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 174 of Plaintiffs' Original Complaint.

175. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 175 of Plaintiffs' Original Complaint.

176. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 176 of Plaintiffs' Original Complaint.

177. Paragraph 177 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 177.

178. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 178 of Plaintiffs' Original Complaint.

179. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 179 of Plaintiffs' Original Complaint.

180. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 180 of Plaintiffs' Original Complaint.

181. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 181 of Plaintiffs' Original Complaint.

182. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 182 of Plaintiffs' Original Complaint.

183. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 183 of Plaintiffs' Original Complaint.

184. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 184 of Plaintiffs' Original Complaint.

185. Paragraph 185 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 185.

186. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 186 of Plaintiffs' Original Complaint.

187. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 187 of Plaintiffs' Original Complaint.

188. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 188 of Plaintiffs' Original Complaint.

189. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 189 of Plaintiffs' Original Complaint.

190. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 190 of Plaintiffs' Original Complaint.

191. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 191 of Plaintiffs' Original Complaint.

192. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 192 of Plaintiffs' Original Complaint.

193. Paragraph 193 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 193.

194. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 194 of Plaintiffs' Original Complaint.

195. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 195 of Plaintiffs' Original Complaint.

196. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 196 of Plaintiffs' Original Complaint.

197. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 197 of Plaintiffs' Original Complaint.

198. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 198 of Plaintiffs' Original Complaint.

199. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 199 of Plaintiffs' Original Complaint.

200. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 200 of Plaintiffs' Original Complaint.

201. Paragraph 201 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 201.

202. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 202 of Plaintiffs' Original Complaint.

203. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 203 of Plaintiffs' Original Complaint.

204. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 204 of Plaintiffs' Original Complaint.

205. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 205 of Plaintiffs' Original Complaint.

206. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 206 of Plaintiffs' Original Complaint.

207. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 207 of Plaintiffs' Original Complaint.

208. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 208 of Plaintiffs' Original Complaint.

209. Paragraph 209 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 209.

210. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 210 of Plaintiffs' Original Complaint.

211. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 211 of Plaintiffs' Original Complaint.

212. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 212 of Plaintiffs' Original Complaint.

213. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 213 of Plaintiffs' Original Complaint.

214. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 214 of Plaintiffs' Original Complaint.

215. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 215 of Plaintiffs' Original Complaint.

216. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 216 of Plaintiffs' Original Complaint.

217. Paragraph 217 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 217.

218. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 218 of Plaintiffs' Original Complaint.

219. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 219 of Plaintiffs' Original Complaint.

220. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 220 of Plaintiffs' Original Complaint.

221. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 221 of Plaintiffs' Original Complaint.

222. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 222 of Plaintiffs' Original Complaint.

223. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 223 of Plaintiffs' Original Complaint.

224. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 224 of Plaintiffs' Original Complaint.

225. Paragraph 225 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 225.

226. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 226 of Plaintiffs' Original Complaint.

227. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 227 of Plaintiffs' Original Complaint.

228. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 228 of Plaintiffs' Original Complaint.

229. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 229 of Plaintiffs' Original Complaint.

230. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 230 of Plaintiffs' Original Complaint.

231. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 231 of Plaintiffs' Original Complaint.

232. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 232 of Plaintiffs' Original Complaint.

233. Paragraph 233 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 233.

234. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 234 of Plaintiffs' Original Complaint.

235. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 235 of Plaintiffs' Original Complaint.

236. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 236 of Plaintiffs' Original Complaint.

237. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 237 of Plaintiffs' Original Complaint.

238. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 238 of Plaintiffs' Original Complaint.



239. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 239 of Plaintiffs' Original Complaint.

240. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 240 of Plaintiffs' Original Complaint.

241. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 241 of Plaintiffs' Original Complaint.

242. Paragraph 242 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 242.

243. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 243 of Plaintiffs' Original Complaint.

244. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 244 of Plaintiffs' Original Complaint.

245. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 245 of Plaintiffs' Original Complaint.

246. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 246 of Plaintiffs' Original Complaint.

247. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 247 of Plaintiffs' Original Complaint.

248. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 248 of Plaintiffs' Original Complaint.

249. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 249 of Plaintiffs' Original Complaint.

250. Paragraph 250 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 250.

251. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 251 of Plaintiffs' Original Complaint.

252. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 252 of Plaintiffs' Original Complaint.

253. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 253 of Plaintiffs' Original Complaint.

254. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 254 of Plaintiffs' Original Complaint.

255. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 255 of Plaintiffs' Original Complaint.

256. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 256 of Plaintiffs' Original Complaint.

257. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 257 of Plaintiffs' Original Complaint.

258. Paragraph 258 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 258.

259. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 259 of Plaintiffs' Original Complaint.

260. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 260 of Plaintiffs' Original Complaint.

261. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 261 of Plaintiffs' Original Complaint.

262. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 262 of Plaintiffs' Original Complaint.

263. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 263 of Plaintiffs' Original Complaint.

264. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 264 of Plaintiffs' Original Complaint.

265. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 265 of Plaintiffs' Original Complaint.

266. Paragraph 266 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 266.

267. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 267 of Plaintiffs' Original Complaint.

268. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 268 of Plaintiffs' Original Complaint.

269. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 269 of Plaintiffs' Original Complaint.

270. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 270 of Plaintiffs' Original Complaint.

271. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 271 of Plaintiffs' Original Complaint.

272. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 272 of Plaintiffs' Original Complaint.

273. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 273 of Plaintiffs' Original Complaint.

274. Paragraph 274 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 274.

275. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 275 of Plaintiffs' Original Complaint.

276. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 276 of Plaintiffs' Original Complaint.

277. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 277 of Plaintiffs' Original Complaint.

278. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 278 of Plaintiffs' Original Complaint.

279. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 279 of Plaintiffs' Original Complaint.

280. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 280 of Plaintiffs' Original Complaint.

281. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 281 of Plaintiffs' Original Complaint.

282. Paragraph 282 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 282.

283. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 283 of Plaintiffs' Original Complaint.

284. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 284 of Plaintiffs' Original Complaint.

285. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 285 of Plaintiffs' Original Complaint.

286. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 286 of Plaintiffs' Original Complaint.

287. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 287 of Plaintiffs' Original Complaint.

288. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 288 of Plaintiffs' Original Complaint.

289. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 289 of Plaintiffs' Original Complaint.

290. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 290 of Plaintiffs' Original Complaint.

291. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 291 of Plaintiffs' Original Complaint.

292. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 292 of Plaintiffs' Original Complaint.

293. Paragraph 293 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 293.

294. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 294 of Plaintiffs' Original Complaint.

295. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 295 of Plaintiffs' Original Complaint.

296. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 296 of Plaintiffs' Original Complaint.

297. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 297 of Plaintiffs' Original Complaint.

298. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 298 of Plaintiffs' Original Complaint.

299. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 299 of Plaintiffs' Original Complaint.

300. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 300 of Plaintiffs' Original Complaint.

301. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 301 of Plaintiffs' Original Complaint.

302. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 302 of Plaintiffs' Original Complaint.

303. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 303 of Plaintiffs' Original Complaint.

304. Paragraph 304 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 304.

305. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 305 of Plaintiffs' Original Complaint.

306. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 306 of Plaintiffs' Original Complaint.

307. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 307 of Plaintiffs' Original Complaint.

308. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 308 of Plaintiffs' Original Complaint.

309. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 309 of Plaintiffs' Original Complaint.

310. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 310 of Plaintiffs' Original Complaint.

311. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 311 of Plaintiffs' Original Complaint.

312. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 312 of Plaintiffs' Original Complaint.

313. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 313 of Plaintiffs' Original Complaint.

314. Paragraph 314 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 314.

315. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 315 of Plaintiffs' Original Complaint.

316. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 316 of Plaintiffs' Original Complaint.

317. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 317 of Plaintiffs' Original Complaint.

318. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 318 of Plaintiffs' Original Complaint.



319. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 319 of Plaintiffs' Original Complaint.

320. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 320 of Plaintiffs' Original Complaint.

321. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 321 of Plaintiffs' Original Complaint.

322. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 322 of Plaintiffs' Original Complaint.

323. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 323 of Plaintiffs' Original Complaint.

324. Paragraph 324 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 324.

325. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 325 of Plaintiffs' Original Complaint.

326. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 326 of Plaintiffs' Original Complaint.

327. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 327 of Plaintiffs' Original Complaint.

328. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 328 of Plaintiffs' Original Complaint.

329. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 329 of Plaintiffs' Original Complaint.

330. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 330 of Plaintiffs' Original Complaint.

331. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 331 of Plaintiffs' Original Complaint.

332. Paragraph 332 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 332.

333. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 333 of Plaintiffs' Original Complaint.

334. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 334 of Plaintiffs' Original Complaint.

335. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 335 of Plaintiffs' Original Complaint.

336. Paragraph 336 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 336.

337. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 337 of Plaintiffs' Original Complaint.

338. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 338 of Plaintiffs' Original Complaint.

339. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 339 of Plaintiffs' Original Complaint.

340. Paragraph 340 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 340.

341. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 341 of Plaintiffs' Original Complaint.

342. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 342 of Plaintiffs' Original Complaint.

343. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 343 of Plaintiffs' Original Complaint.

344. Paragraph 344 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 344.

345. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 345 of Plaintiffs' Original Complaint.

346. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 346 of Plaintiffs' Original Complaint.

347. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 347 of Plaintiffs' Original Complaint.

348. Paragraph 348 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 348.

349. Defendants deny the allegations of paragraph 349.

350. Defendants admit the attorney client relationship.

351. Defendants deny the allegations in paragraph 351.

352. Defendants deny the allegations in paragraph 352.

353. Defendants deny the allegations in paragraph 353.

354. Paragraph 354 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 354

355. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 355 of Plaintiffs' Original Complaint.

356. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 356 of Plaintiffs' Original Complaint.

357. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 357 of Plaintiffs' Original Complaint.

358. Paragraph 358 of Plaintiffs' Original Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 358.

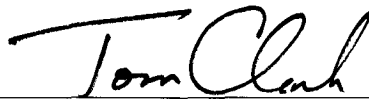
### **AFFIRMATIVE DEFENSES**

By way of affirmative defense, is same be necessary, Defendants would show that:

1. Plaintiffs' claims are barred by Plaintiff(s) lack of standing.
2. Plaintiffs' claims are barred, in whole or in part, by comparative, contributory, superceding or intervening causation.
3. Plaintiffs' claims are barred by quasi and equitable estoppel.
4. Plaintiffs' claims are barred by Plaintiffs' failure to mitigate damages.

Respectfully submitted,

DEALEY, ZIMMERMANN, CLARK,  
MALOUF & MacFARLANE, P.C.

By:   
Mark J. Zimmermann  
State Bar No. 22276420  
Tom C. Clark  
State Bar No. 04298750  
Jill Malouf  
State Bar No. 00790203

3131 Turtle Creek Blvd., Ste. 1201  
Dallas, Texas 75219  
Telephone: (214) 559-4400  
Facsimile: (214) 559-4466  
E-mail: [mz@texlex.com](mailto:mz@texlex.com)  
[tclark@texlex.com](mailto:tclark@texlex.com)  
[jmalouf@texlex.com](mailto:jmalouf@texlex.com)

ATTORNEYS FOR DEFENDANTS  
WHITTEN & YOUNG, P.C.,  
CHARLES C. SELF III, and  
DONALD L. ANDERSON

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via certified mail, return receipt requested, on the 31<sup>st</sup> day of October, 2005, to the following counsel of record:

Tsephanyah Y. Hawkins  
Pro See  
3706 Private Road 2547  
Clyde, Texas 79510



Tom C. Clark

**DEALEY, ZIMMERMANN, CLARK,  
MALOUF & MACFARLANE, P.C.**

Attorneys At Law  
3131 Turtle Creek Boulevard  
Suite 1201  
Dallas, Texas 75219-5415

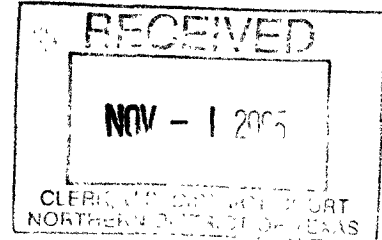
**Tom C. Clark**

214-559-4400 (main)  
214-559-4466 (fax)

**214-559-4411**

(direct)

October 31, 2005



**Via Federal Express**

**8527 4284 0489**

United States District Clerk  
United States District Court  
Northern District of Texas - Abilene Div.  
341 Pine Street, Room 2008  
Abilene, Texas 79601

Re: Cause No. 1-05CV-184C; *Tsephanyah Y. Hawkins, et al. v. The Honorable John W. Weeks, et al*; In the United States District Court for the Northern District of Texas, Abilene Division.

Dear Sir/Madam:

Enclosed for filing, please find the original plus two (2) copies of the *Defendants'*, *Whitten & Young, P.C., Charles C. Self III, and Donald L. Anderson* in the above-referenced case. After filing, please return a file-marked copy to our office in the enclosed, self-addressed, metered envelope.

Thank you for your time and attention to this matter. Should you have any questions, please do not hesitate to call.

Sincerely,

Leslie Cooper, Legal Assistant to:  
TOM C. CLARK

Enclosures

cc: Tsephanyah Hawkins  
Pro Se

Via Certified Mail RRR  
(7004 2510 0002 0273 4032)